

**From:** [Mescher, Jean](#)  
**To:** [Shawn Ghose/R6/USEPA/US@EPA](#)  
**Subject:** RE: Final Version of the Third Five Year Review for Arkwood  
**Date:** 06/22/2011 03:20 PM  
**Attachments:** [Arkwood - Dioxin data.pdf](#)

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Shawn,

Please see added language to your response below as I interpret Dianna's comment. Also, I've attached data from the RI and RA for reference. I will be leaving the office so please reach me on my cell – 608-234-2769.

Jean

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**From:** Ghose.Shawn@epamail.epa.gov [mailto:Ghose.Shawn@epamail.epa.gov]  
**Sent:** Tuesday, June 21, 2011 5:20 PM  
**To:** Mescher, Jean  
**Subject:** Fw: Final Version of the Third Five Year Review for Arkwood

----- Forwarded by Shawn Ghose/R6/USEPA/US on 06/21/2011 05:41 PM -----

RE: Final Version of the Third Five Year Review for Arkwood



Kilburn, Dianna

to: Shawn Ghose,

05/31/2011 02:19 PM

Cc:

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Jean : Please delete this after reading. I want to know what Dianna is asking for?

Dear Mr. Ghose,

The risk based screening levels for PCP, benzo(a) pyrene, and dioxin have been updated several times since the ROD was finalized. Part of any CERCLA 5 year review is to evaluate the remedy relative to the current standards. A change to the remedy is not implied by this comparison, but an evaluation of the remedy in light of updated risk based standards is necessary. This evaluation should include why the present remedy is still protective and changes are not needed.

ADEQ comments were not in reference to the proposed changes for dioxin, but to the current (December 2010) values at the time of the 5 year review. The evaluation relative to currently protective levels is necessary.

Sincerely,  
Dianna Kilburn

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**From:** Ghose.Shawn@epamail.epa.gov [mailto:Ghose.Shawn@epamail.epa.gov]  
**Sent:** Tuesday, May 31, 2011 1:45 PM  
**To:** Egan, Marilyn; Kilburn, Dianna  
**Cc:** Sanchez.Carlos@epamail.epa.gov

**Subject:** Final Version of the Third Five Year Review for Arkwood

Dear Ms Eagan/Kilburn: Most of the comments by ADEQ on the Third Five Year Review for the Arkwood Site has been incorporated to the maximum extent possible, in the latest version. The comments were numerous and would not be enumerated. However regarding industrial standards adopted at the time of the ROD, the change to new standards have not been adopted. The new standards will not start from Regional Screening values. The most important driver for the new standards would be driven by 2,3,7,8 TCDD. The Region was instructed by EPA HQ to put in the following statement:

**MODIFICATIONS TO** The clean-up levels for PCP, c-PNAs and dioxin **ESTABLISHED AT THE TIME OF THE ROD ARE UNDERGOING EVALUATION AND** have not **BEEN FINALIZED**. EPA's dioxin reassessment has been developed and undergone review over many years with the participation of scientific experts in EPA and other federal agencies, as well as scientific experts in the private sector and academia. The Agency followed current cancer guidelines and incorporated the latest data and physiological/biochemical research into the assessment. The results of the assessment have currently not been finalized or adopted into state or federal standards. In addition, EPA/OSWER has proposed to revise the interim preliminary remediation goals (PRGs) for dioxin and dioxin-like compounds based on technical assessment of scientific and environmental data. However, EPA has not made any final decisions on interim PRGs at this time. Therefore, the **PCP, C-PNAS AND** dioxin toxicity reassessment for this Site will be updated during the next Five Year Review. **FOR THE PURPOSES OF THIS REVIEW, THE AREAS OF THE SITE FORMERLY EXHIBITING ELEVATED CONCENTRATIONS WERE REMEDIATED TO THE CLEAN-UP LEVELS ESTABLISHED BY THE ROD AND CAPPED. SINCE THE CAP ENCOMPASSES THESE AREAS AND EXTENDS TO COVER ALL AREAS OF FORMER OPERATIONS, AS LONG AS THE CAP REMAINS INTACT AND UNDISTURBED, THERE IS NO COMPLETE EXPOSURE PATHWAY AND THE REMEDY REMAINS PROTECTIVE.**

Sincerely

Shawn Ghose M.S., P.E., ASME  
RPM Arkwood Superfund Site